

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

MATTHEW RAYMOND,

Plaintiff,

– against –

TROY MITCHELL, et al.,

Defendants.

No. 18 Civ. 01467

DECLARATION OF KATHERINE ROSENFELD

I, KATHERINE ROSENFELD, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner with the firm of Emery Celli Brinckerhoff Abady Ward & Maazel LLP, counsel for Plaintiff in the above-captioned matter. I submit this declaration in support of Plaintiff's opposition to Defendants' motion for summary judgment, Dkt. 168.

2. A true and correct copy of excerpts from the transcript of the deposition of Plaintiff Mathew Raymond is attached as Exhibit 1.

3. A true and correct copy of photographs taken of Plaintiff after the September 14, 2016 Incident are attached as Exhibit 2.

4. A true and correct copy of the Inmate to Injury report relating to the September 14, 2016 Incident is attached as Exhibit 3.

5. A true and correct copy of an entry dated September 14, 2016 from Plaintiff's Ambulatory Health Record is attached as Exhibit 4.

6. A true and correct copy of excerpts from the transcript of the deposition of Michelle Raymond is attached as Exhibit 5.

7. A true and correct copy of excerpts from the transcript of the deposition of Aimee Hoppins RN is attached as Exhibit 6.

8. A true and correct copy of the deposition transcript of Dr. John R Valvo is attached as Exhibit 7.

9. A true and correct copy of the expert report of Dr. John R. Valvo dated October 18, 2021 is attached as Exhibit 8.

10. A true and correct copy of the deposition transcript of Dr. Robert Knapp is attached as Exhibit 9.

11. A true and correct copy of the expert report of Dr. Robert Knapp is attached as Exhibit 10.

12. A true and correct copy of the expert report of Dr. Sherry A. Withiam Leitch dated July 23, 2021 is attached as Exhibit 11.

13. A true and correct copy of the deposition transcript of Dr. Sherry A. Withiam Leitch is attached as Exhibit 12.

14. A true and correct copy of the expert report of Dr. Jonathan M. Vapnek dated December 17, 2021 is attached as Exhibit 13.

15. A true and correct copy of the deposition transcript of Dr. Jonathan M. Vapnek is attached as Exhibit 14.

16. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: October 6, 2023
New York, New York

/s/Katherine Rosenfeld
Katherine Rosenfeld